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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

JUL 07 2021

SEAN F. McAVOY, CLERK  
DEPUTY  
SPOKANE, WASHINGTON

9 UNITED STATES DISTRICT COURT  
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 BRADLEY CAMPBELL,

15 Defendant.

**2:21-CR-87-SAB**

INDICTMENT

Vio: 18 U.S.C. § 1832(a)(1)  
Theft of Trade Secrets

18 U.S.C. §§ 981(a)(1)(C),  
1834, 2323; 28 U.S.C.  
§ 2461(c)  
Forfeiture Allegations

16 The Grand Jury charges:

17 On or about June 30, 2020, in the Eastern District of Washington, the

18 Defendant, BRADLEY CAMPBELL, with the intent to convert a trade secret that  
19 is related to a product and service used in and intended for use in interstate and  
20 foreign commerce, specifically designs, formulations, and techniques for billet  
21 casting equipment, to the economic benefit of a person other than the trade secret's  
22 owner, and knowing that the offense will injure any owner of that trade secret,  
23 knowingly did steal such information, in violation of 18 U.S.C. § 1832(a)(1).  
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INDICTMENT – 1

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 18 U.S.C. §§ 981(a)(1)(C), 1834, 2323, and 28 U.S.C. § 2461(c), upon conviction of an offense in violation of 18 U.S.C. § 1832(a)(1), as charged in the sole Count of this Indictment, the Defendant, BRADLEY CAMPBELL, shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation and/or any property used, or intended to be used, in any manner or part to commit or facilitate the commission of an offense.

If any forfeitable property, as a result of any act or omission of the Defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

1 the United States of America shall be entitled to forfeiture of substitute property  
2 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1).  
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4 DATED this 7 day of July, 2021.  
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